

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division

NATKAI AKBAR, *individually, and on* )  
*behalf of others similarly situated,* )

Plaintiff, )

v. )

Civil Action No. 4:12-cv-53-AWA-TEM

LAW OFFICES OF SHAPIRO, BROWN )  
& ALT, LLP, F/K/A LAW OFFICES OF )  
SHAPIRO & BURSON, LLP, )

Defendant. )

**CONSENT MOTION TO STAY THE PROCEEDINGS  
PENDING MEDIATION BY THE PARTIES**

Plaintiff NATKAI AKBAR, *individually, and on behalf of others similarly situated*, by counsel, and with the consent of the Defendant, hereby moves the court for the entry of an Order to Stay the proceedings in this matter to allow the parties to mediate this and related cases. Together, Plaintiff in this case and other Plaintiffs with cases pending against Defendant Shapiro, Brown & Alt, LLP ("SB&A"), will join a motion to consolidate all such cases, pleading the same basic causes of action against defendants that are currently pending in this court.

1. Plaintiff and Defendant have agreed to mediate this and other like cases already pending.

2. It is within the court's sound discretion to stay this case while the parties focus on resolving their differences without incurring the expense of engaging actively in discovery and the use of judicial resources to decide motions and otherwise preside over this litigation as the parties prepare for trial.

3. The parties have agreed to engage the services of a private mediator in order to assist in the resolution of this case by compromise.

4. Upon the agreement of the parties and for the good cause shown, Plaintiff respectfully requests that this Court grant a stay and enter the Proposed Consent Order submitted to the Court. Granting a stay would be in the interest of justice and would promote resolution of the case by compromise.

Dated: August 7, 2012

Respectfully submitted,

NATKAI AKBAR, *individually, and on behalf of others similarly situated,*

\_\_\_\_\_/s/\_\_\_\_\_  
\_\_\_\_\_

Kristi Cahoon Kelly, Esq. (VSB #72791)  
Surovell Isaacs Petersen & Levy PLC  
4010 University Drive, Suite 200  
Fairfax, VA 22030  
703-277-9774  
Fax: 703-591-9285  
Email: kkelly@sipfirm.com

Leonard Anthony Bennett, Esq. (VSB #37523)  
Susan Mary Rotkis, Esq. (VSB #40693)  
Consumer Litigation Associates  
763 J Clyde Morris Boulevard, Suite 1A  
Newport News, VA 23601  
757-930-3660  
Fax: 757-930-3662  
Email: lenbennett@clalegal.com  
Email: srotkis@clalegal.com

Matthew James Erausquin, Esq. (VSB #65434)  
Consumer Litigation Associates PC  
1800 Diagonal Road, Suite 600  
Alexandria, VA 22314  
703-273-6080  
Fax: 888-892-3512  
Email: matt@clalegal.com

Dale Wood Pittman, Esq. (VSB #15673)  
The Law Office of Dale W. Pittman, P.C.  
112-A W Tabb St  
Petersburg, VA 23803-3212  
(804) 861-6000  
Fax: (804) 861-3368  
Email: dale@pittmanlawoffice.com  
*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of August 2012 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

Bizhan Beiramee, Esq.  
Beiramee & Cohen PC  
6663 B Old Dominion Dr.  
Third Floor  
McLean, VA 22101  
(703) 483-9600  
Fax: (703) 483-9599  
Email: bbeiramee@beiramee.com

John C. Lynch, Esq.  
Troutman Sanders LLP  
P. O. Box 61185  
222 Central Park Ave  
Suite 2000  
Virginia Beach, VA 23462  
(757) 687-7541  
Fax: (757) 687-1541  
Email: john.lynch@troutmansanders.com

Ethan G. Ostroff, Esq.  
Troutman Sanders LLP  
222 Central Park Ave  
Suite 2000  
Virginia Beach, VA 23462  
(757) 687-7541  
Fax: (757) 687-1541  
Email: john.lynch@troutmansanders.com  
*Counsel for Defendant*

/s/  
Kristi Cahoon Kelly, Esq. (VSB #72791)  
Surovell Isaacs Petersen & Levy PLC  
4010 University Drive, Suite 200  
Fairfax, VA 22030  
703-277-9774  
Fax: 703-591-9285  
Email: kkelly@sipfirm.com  
*Counsel for Plaintiff*